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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PENDLETON DIVISION

OREGON FIREARMS FEDERATION,)	
INC., et al.,)	
)	Civil No.
Plaintiffs,)	2:22-cv-01815-IM
v.)	(Lead Case)
)	
TINA KOTEK, et al.,)	Civil No.
)	3:22-cv-01859-IM
Defendants.)	(Trailing Case)
)	
(Continued))	Civil No.
)	3:22-cv-01862-IM
)	(Trailing Case)
)	
)	Civil No.
)	3:22-cv-01869-IM
)	(Trailing Case)
)	

* VIDEOCONFERENCE *

DEPOSITION UPON ORAL EXAMINATION
OF EXPERT

ROBERT J. SPITZER

Witness located in:

Williamsburg, Virginia

* All participants appeared via videoconference *

DATE TAKEN: April 5, 2023
REPORTED BY: Tia B. Reidt, Washington RPR, CCR #2798
Oregon #22-0001

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1 _____

2 (continued))

3 MARK FITZ, et al.,)

4 Plaintiffs,)

5 v.)

6 ELLEN F. ROSENBLUM, et al.,)

7 Defendants.)

8 _____

9 KATERINA B. EYRE, et al.,)

10 Plaintiffs,)

11 v.)

12 ELLEN F. ROSENBLUM, et al.,)

13 Defendants.)

14 _____

15 DANIEL AZZOPARDI, et al.,)

16 Plaintiffs,)

17 v.)

18 ELLEN F. ROSENBLUM, et al.,)

19 Defendants.)

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APPEARANCES

For Oregon Firearms Federation:

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* * * * *

1 question.

2 Go ahead. You can answer.

3 THE WITNESS: Yeah, I wouldn't call it an
4 opinion, exactly, but as I'm sure you know, there are
5 competing estimates about how many firearms there are
6 in America in civilian hands. There is no
7 authoritative source of information because the
8 government does not collect that. And it's generally
9 determined through public opinion polls, and polling
10 results vary. There probably are something like 350
11 million -- 350 million guns in America. Some number in
12 that ballpark.

13 BY MR. WILLIAMSON:

14 Q. Yes. I've heard a similar estimate, and one
15 as high as, I think, 413 million. Something like that.

16 A. Yes.

17 Q. That's based on, like, National Shooting
18 Sports Foundation's sales records and things as opposed
19 to survey results.

20 A. Right.

21 Q. Have you examined as part of your work state
22 requirements for obtaining a permit to purchase?

23 A. I have not examined them systematically. Of
24 course, different states have different standards. I
25 am acquainted with the New York state permitting

1 standard because I went through that process about ten
2 years ago.

3 Q. And I think you testified about that.

4 So let me see if I can find an exhibit here
5 really quickly.

6 Do you have access to Exhibit Number 22?

7 A. Oh, 22. Yes. Let's see.

8 Oregon State Police?

9 Q. Yes.

10 A. 2022.

11 Q. Yes.

12 A. Got it.

13 Q. I'm having a similar problem with mine loading
14 the document.

15 A. I'm glad it's not just me.

16 Q. Okay. So on page 16, it's referenced as
17 appendix number C.

18 A. Okay.

19 Page 16, Appendix C.

20 Q. Yes.

21 MR. WILLIAMSON: Was everybody else able
22 to open that?

23 (No response.)

24 BY MR. WILLIAMSON:

25 Q. So Appendix C lists the disqualifiers for

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C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Tia Reidt, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of ROBERT J. SPITZER, having been duly sworn, on April 5, 2023, is true and accurate to the best of my knowledge, skill and ability. Reading and signing was requested pursuant to FRCP Rule 30(e).

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 11th day of April, 2023.



/S/ Tia B. Reidt
Tia B. Reidt, RPR, CCR #22-0001
NOTARY PUBLIC, State of
Washington.
My commission expires
5/15/2026.